



STATE OF MICHIGAN
DEPARTMENT OF EDUCATION
LANSING

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GOVERNOR

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STATE SUPERINTENDENT

FOOD SERVICE

ADMINISTRATIVE POLICY NO. 8
SCHOOL YEAR 2015-2016

SUBJECT: School Food Authority Self-Monitoring for the National School Lunch Program, School Breakfast Program, and Afterschool Snack Program

DATE: November 24, 2015

School Food Authority (SFA) Self-Monitoring is completed to ensure child nutrition programs are in compliance with the National School Lunch Program (NSLP), School Breakfast Program (SBP), and Afterschool Snack Program regulations.

National School Lunch Program regulations 7 CFR 210.8(a)(1) require SFAs with more than one building, including Residential Child Care Institutions (RCCIs) with day programs, to conduct an annual Self-Monitoring Review in each building before February 1. However, as a best practice, the Michigan Department of Education (MDE) School Nutrition Programs encourages SFAs with only one building to conduct a self-monitoring review.

If the SFA participates in the Afterschool Snack Program, reviews must be completed two times per year [7 CFR 210.9(c)(7)]. The first review must be during the first four weeks that the snack program is in operation. The second review must be conducted during the second half of the school year.

NSLP and SBP Self-Monitoring Reviews must assess:

- Application Approval/Direct Certification/Master Roster – SFAs must review all free, reduced price, and denied applications to ensure they have been accurately certified and students are receiving the correct benefits in compliance with the Eligibility Manual for School Meals.
- Meal Count Systems – Monthly claims for reimbursement must be supported by an accurate counting system for free, reduced price, and paid meals in each building. Systems that are not allowable include tray counts, attendance counts, and “back out” counts (i.e., dividing cash box total by lunch price to arrive at paid count, and subtracting that number from daily total of meals served to arrive at the free count). Overt identification of students is not permitted. An actual count of meals served at the point of service is acceptable.

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- Edit Checks – Daily count of free, reduced price, and paid meals for each school are checked against: (1) the number of children in school currently eligible for free, reduced price, and paid meals, and (2) the number of attendance adjusted eligibles.

The annual SFA Self-Monitoring Reviews must include a review of the claim forms for one month. The claims for the review month must be checked for the following:

- Meals claimed by category (free, reduced price, and paid) that exceed the number of approved free, reduced price, and paid eligible students.
- Any day during the review month that the number of meals claimed by category (free, reduced price, and paid) exceeds the number of attendance adjusted eligible.
- Evaluation, explanation, and documentation of any days during the review period that exceed attendance adjusted eligible or total number of eligible students (free, reduced price, and paid).
- Records of accurately totaled daily meal counts.
- Internal controls for monitoring and edit checks to ensure claims for reimbursement are based on accurate daily meal count consolidation for all schools.
- Meal Planning/Food Production-
 - Menus and meals served must be checked at each site for availability of all meal components, offer versus serve, and required portion sizes.
 - Signage that identifies components that make up a reimbursable meal is located near or at the beginning of the meal service lines for both breakfast and lunch.
 - Free potable water is available to all students for lunch in each location where lunches are served, and for breakfast when breakfast is served in the cafeteria. The location of the free potable water must be in the meal service area or immediately adjacent to the meal service area.
- Food Safety Practices-
 - The most recent food safety inspection report is posted in a publicly visible location.
 - Temperature logs are being used and available for review.
 - A copy of the SFA food safety plan is available at each meal service site.
- Compliance with Civil Rights requirements:
 - The "And Justice for All" poster is posted in a prominent location and visible to all program participants.

More information is available at [The Michigan Department of Education School Nutrition Programs website](#) and [the United States Department of Agriculture Food and Nutrition school-meals/child-nutrition programs website](#).

Afterschool Snack Program SFA Self-Monitoring Review must assess:

- Area Eligibility Meal Count System – A site is "area eligible" if it is located at a school or in the attendance area of a school where at least 50% of enrolled children are eligible for free or reduced price meals. The site must record and report total number of snacks served each day.

- Non-Area Eligibility Meal Count System - Monthly claim for reimbursement must be supported by an accurate counting system that provides an accurate count of free, reduced price, and paid snacks.
- General Operations - Eligible programs must include education or enrichment activities in organized, structured, and supervised environments. Program must operate at the end of the normal school day.
- Meal Patterns/Food Production - Menus and meals served must be checked at each site for availability of all meal components and required portion sizes.
- Compliance with Civil Rights requirements:
 - The "And Justice for All" poster is posted in a prominent location and visible to all program participants.

Review findings discovered during the SFA Self-Monitoring Review for National School Lunch, School Breakfast, and/or Afterschool Snack Programs must be discussed with the person overseeing meal service at the school building. A corrective action plan must be developed and implemented for the school building by the SFA.

Any building requiring corrective action must have a SFA Self-Monitoring Follow-up Review within 45 calendar days of the initial review. The SFA must identify and document that all finding(s) has/have been corrected.

All SFA Self-Monitoring Review forms must be maintained by the SFA. Forms will be reviewed as part of the Administrative Review. United States Department of Agriculture (USDA) regulations require SFAs to retain all records for three years plus the current year or until a pending audit is closed.

Food Service Management Company (FSMC) personnel *may not* perform SFA Self-Monitoring Reviews. Only SFA employees may perform SFA Self-Monitoring Reviews.

Questions regarding this Administrative Policy should be directed to the School Nutrition Programs Unit by e-mail to MDE-SchoolNutrition@michigan.gov.

NATIONAL SCHOOL LUNCH PROGRAM/SCHOOL BREAKFAST PROGRAM SCHOOL FOOD AUTHORITY SELF-MONITORING REVIEW

School Name	Agreement #
School Food Authority & Title	Review Date

One review per building MUST be completed by FEBRUARY 1.

As a best practice the Michigan Department of Education (MDE) School Nutrition Programs encourages SFA's with only one building to conduct a self-monitoring review.

Application Approval/Direct Certification/Master Roster

	Yes	No	N/A
1. Are all free and reduced price applications on file correctly approved or denied?			
2. Is correct direct certification documentation maintained?			
3. Do names listed on the Benefit Issuance List match approved applications on file and names on the direct certification list?			

Meal Count Systems

4. Is the method used for counting reimbursable meals in compliance with the approved Point of Service requirement? (Meal counts <i>must</i> be taken at the location where complete meals are served to children.)			
5. Is the Point of Service meal count used to determine the school's claim for reimbursement?			
6. Is the person responsible for monitoring meals correctly identifying reimbursable meals for the menu planning option selected by the School Food Authority?			
7. Are only meals that meet meal pattern requirements counted and claimed for reimbursement?			
8. Does the meal count system prevent overt identification?			
9. Does the school have a backup counting system in case of mechanical failure of an automated system?			
10. Is the school correctly implementing policies for handling the following (as applicable):			
a. A la carte?			
b. Adult and non-student meals (and identifying program vs. non-program)?			
c. Charged and/or prepaid meals?			
d. Field trips?			
e. Incomplete meals?			
f. Lost, stolen, misused, forgotten or destroyed tickets, tokens, IDs, PINs?			
g. Offer vs. Serve?			
h. Second meals?			
i. Student worker meals?			
j. Visiting student meals?			
11. Is there a method of identifying non-reimbursable meals (i.e., not meeting meal pattern requirements, seconds, adult meals, etc.), distinguishing them from reimbursable meals?			

REVIEW (cont.)

Edit Checks

	Yes	No	N/A
12. For any day during the review month, do the number of meals claimed by category (free, reduced price, and paid) exceed the number of approved free, reduced price, and paid eligible students?			
13. For any day during the review month, does the number of meals claimed by category (free, reduced price, and paid) exceed number of attendance adjusted eligible students?			
14. If the number of meals claimed by category (free, reduced price, and paid) any day during the review period exceeds attendance adjusted eligible students or total number of eligible students, is it evaluated and documented?			
15. Are daily counts correctly totaled and recorded?			
16. Are the claims for all schools consolidated and are internal controls (edits, monitoring, etc.) established to ensure that daily counts do not exceed the number of students eligible or in attendance and that an accurate claim for reimbursement is made? Record today's meal counts by category and compare to the number of students eligible by category.			

Meal Planning/Food Production

17. Does the menu for the review month meet meal planning system requirements?			
18. Is there signage that identifies components that make up a reimbursable meal located near or at the beginning of the meal service lines for both breakfast and lunch?			
19. Free potable water is available to all students for lunch in each location where lunches are served, and for breakfast when breakfast is served in the cafeteria. Is the location of the free potable water in the meal service area or immediately adjacent to the meal service area?			
20. Are production records completed daily for all school meals programs, including breakfast, lunch, and afterschool snack?			
21. Do production records document that enough food is prepared to meet the requirements for reimbursable meals for number of meals claimed?			

Food Safety

22. Is the most recent food safety inspection report posted in a publicly visible location?			
23. Are temperature logs being used and available for review?			
24. Is a copy of the SFA food safety plan available at each meal service site?			

Compliance with Civil Rights requirements

25. Is the "And Justice for All" Poster posted in a prominent location and visible to all program participants?			
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Review Results

26. If a Corrective Action Plan is required, what is the Corrective Action Plan due date?			
<i>Required Corrective Action Plan as discussed with school representative:</i>			

27. If a Follow Up Review is required, what is the Follow Up Review due date? *(within 45 days of original review)*

Comments, Notes, and Observations:

X

X

SFA Reviewer Signature and Title

School Site Representative Signature and Title

Compliance with Civil Rights requirements

**AFTERSCHOOL SNACK PROGRAM
SELF- MONITORING REVIEW**

School Name	Agreement #
School Food Authority & Title	Review date

One review per building MUST be completed TWO TIMES per school year.

Area Eligible Meal Count System

		Yes	No	N/A
1	Is the site area eligible?			
2	Are children receiving snacks at no charge?			
3	Are snacks served to children being counted and claimed as free?			
4	Are snacks served to children being counted at the point of service?			

Non-Area Eligible Meal Count System

5	Is the site non-area eligible?			
6	Does the meal count system produce an accurate count of reimbursable snacks by category (free, reduced price, and paid) served to eligible children at the point of service?			
7	Are snacks that meet meal pattern requirements counted and claimed for reimbursement?			
8	Does the meal count system prevent overt identification?			

General Operation

9	Times(s) of operation for the snack program () p.m.			
10	Is the program operated after the end of the normal school day?			
11	Is there a sign-in sheet or roster of students who participate in the Afterschool Snack program?			
12	Does program provide care for children?			
13	Is there an educational and /or enrichment element in program?			
14	Are care and activities supervised?			

Meal Patterns /Food Production

15	Does the menu for the review month meet snack meal pattern requirements?			
16	Does the menu on the day of review meet snack meal pattern requirements?			
17	Are production records completed daily for the Afterschool Snack program?			
18	Do production records document that enough food is prepared to meet the requirements for reimbursable snacks for the number of snacks claimed?			
19	Is a copy of the food safety plan available on site?			

Civil Right Compliance

20	Is the correct non-discrimination poster "And Justice for All" displayed in an area where the Afterschool snack meal is held?			

Review Results

21	If a Corrective Action Plan is required, what is the Corrective Action Plan Due Date?	

Required Corrective Action Plan as discussed with school representative:

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22	If a Corrective Action Plan is required, What is the follow-up review due date?	
Comments, Notes and Observations:		

X	X
SFA Reviewer Signature and Title	School Site Representative and Title